

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

VANIA MOORE,

Plaintiff,

V.

**WILLSTAFF CRYSTAL, INC.,
d/b/a WILLSTAFF WORLDWIDE**

Defendant.

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) **Civil Action No.:**
) **1:06-cv-1128-WKW**
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**UNOPPOSED MOTION TO EXTEND DISCOVERY
AND DISPOSITIVE MOTION DEADLINES**

Defendant WillStaff Crystal, Inc. d/b/a WillStaff Worldwide (“Defendant”) hereby moves this Honorable Court to extend the current discovery and dispositive motion deadlines by an additional sixty (60) days. As grounds for this motion, Defendant states as follows:

1. Plaintiff brings this case alleging she was discriminated and retaliated against because of her race in violation of Title VII and 42 U.S.C. § 1981. The dispositive deadline is September 11, 2007 and the discovery deadline is November 2, 2007.

2. To date, written discovery and some documents have been exchanged. The parties discussed scheduling depositions the last week of August, but based on

scheduling conflicts have been unable to schedule the depositions. Based on counsels' schedules the parties anticipate the earliest the depositions could be scheduled are late September or mid-October. The parties believe a sixty (60) day extension will allow them to complete discovery on the Plaintiff's claims at issue in this case.

3. Therefore, Defendant requests that that the current discovery and dispositive motion deadlines be extended by sixty (60) days.

4. Plaintiff is not opposed to this motion.

WHEREFORE, Defendant WillStaff Crystal, Inc. d/b/a WillStaff Worldwide respectfully requests that the Court grant this unopposed motion and extend the discovery and dispositive motion deadlines by sixty (60) days.

Respectfully submitted,

s/Stacey T. Bradford
James P. Alexander
Stacey T. Bradford
Attorneys for Defendant
WillStaff Crystal, Inc. d/b/a
WillStaff Worldwide

OF COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jon C. Goldfarb, Esquire
Ethan R. Dettling, Esquire
Wiggins, Childs, Quinn & Pantazis, LLC
The Kress Building
301 19th Street North
Birmingham, Alabama 35203

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

None.

s/ Stacey T. Bradford
Stacey T. Bradford (THU004)
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